

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE PORK ANTITRUST LITIGATION

Case No. 0:18-cv-01776-JRT-HB

This Document Relates To:
Direct Purchaser Plaintiffs actions

**DECLARATION OF BRIAN D.
CLARK IN SUPPORT OF MOTION
OF DIRECT PURCHASER
PLAINTIFFS TO APPOINT
INTERIM CO-LEAD COUNSEL**

I, Brian D. Clark, declare:

1. I am an attorney licensed to practice in the State of Minnesota and have been admitted to practice in several courts across the country, including this Court. For almost a decade I have been an attorney with the firm of Lockridge Grindal Nauen P.L.L.P. (“LGN”), attorneys of record for Plaintiff Maplevale Farms, Inc. I make this declaration in support of the accompanying Motion of Direct Purchaser Plaintiffs to Appoint Interim Co-Lead Counsel. I have personal knowledge of the facts in this declaration and could competently testify to them if called as a witness.

2. LGN currently serves as Plaintiffs’ co-lead counsel in *In re Broiler Chicken Antitrust Litig.*, Case No. 1:16-cv-08637 (N.D. Ill.), in which Judge Thomas Durkin appointed LGN and PSW as DPP co-lead counsel based on their qualifications, reputation, and the other factors outlined in Fed. R. Civ. P. 23(g)(1)(A). These firms were the first to investigate the facts giving rise to the Broiler Chicken cases, which led directly to Plaintiffs’ investigation of similar conduct in the pork industry. I have personally been

involved in all aspects of the litigation, including coordinating among three classes and 37 direct action plaintiffs, appearing at numerous status hearings, coordinating discovery, and otherwise leading prosecution of the *Broiler Chicken* case.

3. LGN specializes in antitrust litigation. For forty years, LGN has prosecuted antitrust cases on behalf of large and small business injured by price-fixing, bid-rigging and other violations of the antitrust laws. We also practice in securities, environmental, employment, health care, commercial, intellectual property and telecommunications law. We have particular expertise in complex litigation, including federal multidistrict litigation. Our attorneys are skilled in pursuing and managing large complicated cases efficiently and cost-effectively. From this solid foundation, we regularly produce positive results for our clients and class members. In the last ten years alone, antitrust cases in which LGN played a significant role have recovered more than \$2 billion.

4. I am a longtime member of LGN's antitrust law group, and practice extensively in antitrust litigation in federal and state courts nationwide. As described above, I have been extensively involved in several nationwide antitrust class actions. I also lead the firm's e-discovery practice group. I advise clients of all sizes on e-discovery matters, and have taught e-discovery at the University of Minnesota Law School for the past five years. I was named an "Up and Coming Attorney" by Minnesota Lawyer Magazine in 2015, and have been consistently named as a Super Lawyers Rising Star by my peers.

5. My firm's background and my own experience, our efforts to investigate and develop the allegations contained in our complaints, and our clients' significant stake in

this litigation give my firm and me a solid foundation by which we can prosecute this case efficiently and expeditiously.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 26, 2018, at Minneapolis, Minnesota.

s/ Brian D. Clark

Brian D. Clark